

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, AFL-CIO,
et al.,

Plaintiffs,

V.

Civil Action No. 1:25-cv-10276

CHARLES EZELL, ACTING DIRECTOR,
OFFICE OF PERSONNEL
MANAGEMENT, et al,

Defendants.

DEFENDANTS' MOTION FOR ENLARGEMENT OF PAGES

Defendants move pursuant to Local Rule 7.1(b)(4) for leave of Court to file this overlong brief opposing Plaintiffs' motion for a temporary restraining order. ECF No. 11. Defendants have good cause to request an additional five pages due to the tight timetable required to prepare for today's hearing on Plaintiffs' motion, *see* ECF No. 29, and the complexity of the issues before the Court. Plaintiffs' motion raises numerous and substantial legal questions, which require nuanced attention on a highly shortened timetable. Due to the press of business to meet this deadline, Defendants have not had an opportunity to meet and confer with Plaintiffs with respect to this motion. For the foregoing reasons, Defendants respectfully request that the Court grant this motion for an overlong brief. A copy of the proposed brief is attached.

Dated: February 6, 2025

Respectfully submitted,

BRETT A. SHUMATE
Acting Assistant Attorney General

DIANE KELLEHER
Director, Federal Programs Branch

/s/ Joshua E. Gardner

JOSHUA E. GARDNER
(FL Bar No. 302820)
Special Counsel

JASON ALTABET
Trial Attorney
KEVIN BELL
Trial Attorney
United States Department of Justice
Civil Division, Federal Programs Branch
1100 L St. NW
Washington, DC 20005
Phone: (202) 305-7583
E-mail: Joshua.E.Gardner@usdoj.gov

CERTIFICATE OF SERVICE

On February 6, 2025, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court for the District of Massachusetts, using the electronic case filing system of the court. I hereby certify that I have served all parties electronically or by another manner authorized by Fed. R. Civ. P. 5(b)(2).

/s/ Joshua E. Gardner
JOSHUA E. GARDNER
(FL Bar No. 302820)
Special Counsel